

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Advanced Television Systems)
and Their Impact upon the)
Broadcast Service)

MM Docket No. 87-268

FCC 97-115; 97-116

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION

Harish Puri, permittee of new television station WJNW(TV), Janesville, Wisconsin ("WJNW(TV)"), by his attorney, hereby supplements his Petition for Reconsideration^{1/} of the Commission's Sixth Report and Order^{2/} in the above-referenced proceeding, pursuant to the Commission's July 2 Order concerning the release of OET Bulletin No. 69.^{3/} WJNW(TV) is currently authorized to operate on NTSC channel 57 with 3980 kW effective radiated power ("ERP"). In the Sixth Report, the Commission allotted WJNW(TV) DTV channel 32 with 75.9 kW ERP. WJNW(TV) believes that this DTV power level will not be sufficient to replicate its authorized NTSC Grade B contour, and hereby urges the Commission to allot additional power to WJNW(TV)'s DTV operation in order to achieve this Grade B replication. See attached Engineering Statement of Sudhir K. Khanna.

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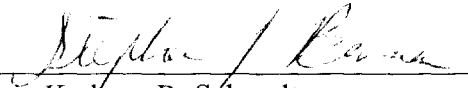
^{1/} Petition for Reconsideration of the Sixth Report and Order, Harish Puri, dated June 13, 1997.

^{2/} Sixth Report and Order, Advanced Television Systems and Their Impact on Existing Television Service, MM Docket No. 87-368, 62 Fed. Reg. 26,684 (May 14, 1997) ("Sixth Report").

^{3/} Order, MM Docket No. 87-268, (July 2, 1997).

Respectfully submitted,

HARISH PURI
Station WJNW(TV), Janesville, WI

By: 
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Dated: August 22, 1997

ATTACHMENT

ENGINEERING STATEMENT
RE REQUEST FOR INCREASE IN POWER
FOR DTV OPERATION OF
WJNW(TV), JANESVILLE, WISCONSIN

AUGUST 1997

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

This engineering statement has been prepared on behalf of Harish Puri, permittee of a new TV station WJNW(TV), Janesville, Wisconsin in support of his request for increase in the allotted effective radiated power (ERP) for the proposed DTV operation. At present, station WJNW(TV) is authorized (File No. BMPCT-950316KF) to operate on analog NTSC Channel 57 (728-734 MHz) with 3980 kW ERP and 342 meters antenna height above average terrain (HAAT).

Under Sixth Report and Order in MM Docket 87-268, the Commission has allotted a new 6 MHz wide TV channel to each broadcast licensee for digital television operation. Station WJNW(TV) was allotted UHF Channel 32 with 75.9 kW ERP and 342 meters antenna height for its DTV operation. Station WJNW(TV) is concerned that it would not be able to provide strong DTV signals to replicate its authorized Grade B contour with the low DTV power assigned to the station. Therefore, WJNW(TV) requests the Commission that station be assigned higher power for its DTV operation.

Station WJNW would be providing TV service to the Madison, Wisconsin DMA. There are four other commercial stations which serve the Madison DMA. These TV stations are WISC-TV (Channel 3), WMTV (Channel 15), WKOW-TV (Channel 27) and WMSN-TV (Channel 47). These TV stations have been assigned ERP values ranging from 50 kW to 363.9 kW for their DTV operations with station WISC-TV being assigned the largest power.

In Sixth Report and Order, the Commission also indicated it would allow the stations to request DTV power to replicate the largest Grade B contour in a market. Therefore, the Commission should allot similar ERP to WJNW(TV) as assigned to station WISC-TV.

An engineering study was conducted to determine whether higher DTV power for WJNW DTV's operation would result in excessive predicted interference to the existing analog NTSC and other proposed DTV allotments. The service and interference analysis studies were made according to the procedure described in the OET Bulletin 69. The attached Tables I and II list the pertinent analog and DTV stations, respectively, which were considered for the interference study. These Tables indicate some of the minimum distance requirements listed in Section 73.623 of the rules for future DTV allotments would not be fully satisfied. However, most of the co-channel and adjacent channels analog NTSC and the proposed DTV allotments are located far enough not to have any significant impact on their operations from the proposed WJNW DTV operation with higher power.

The nearest co-channel analog NTSC operation (WFLD) is at Chicago, IL. Station WFLD is located 161.4 kilometers from the WJNW(TV) site. There is no co-channel DTV allotments within 300 kilometers of the WJNW(TV) site.

Although some additional predicted interference may result to other analog operations and the proposed DTV allotments, it is believed that such predicted interference falls within the acceptable range of the DTV allotment process. The Commission itself has allotted DTV

channels which result in some predicted interference to the current analog NTSC as well as the proposed DTV operations. However, such limited interference, as proposed in the case of WJNW(TV), was not considered excessive.

August 22, 1997

Respectfully submitted,



Sudhir K. Khanna
District of Columbia
Professional Engineer
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